



STATE OF ILLINOIS)

COUNTY OF St. Clair)

AFFIDAVIT OF CUSTODIAN OF GRIEVANCE RECORDS

Before me, the undersigned Notary Public, personally appeared Yvonne McCall
who, being by me duly sworn, deposed as follows:

My name is Yvonne McCall (Custodian of Records), I am of sound
mind, capable of making this affidavit, and personally acquainted with the following facts:

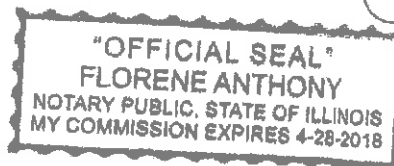
I am a custodian of grievance records of St. Clair County Correctional Center (hereinafter
"this facility." Attached to this affidavit are 22 pages of records from this facility regarding
Dallas McIntosh. These 22 pages of records are kept by this facility in the regular course of
business, and it was the regular course of business of this facility for an employee or
representative to make a record of or to transmit information thereof to be included in such
record; and the record was made at or near the time of the act or event. The records attached
hereto are the original or exact duplicates of the original.

Yvonne McCall
Affiant

IN WITNESS WHEREOF I have hereunto subscribed my name and affixed my official
seal this 8th day of November 2017

Florence Anthony
Notary Public

My Commission Expires: 04-28-18



St Clair County Jail



DETAINEE GRIEVANCE FORM

Detainee Name: Dallas F. McIntosh

Cell Assignment: E-7 Booking Number: 201207710

Date of Grievance Occurrence: 1/24/15

Nature of Grievance: This Grievance is in reference to several conditions and circumstances of which I have complained about in numerous Captains request-complaint forms and have received no responses to date. For purposes of organization and coherence I will address these issues in numbered sequence as follows:

Action/Response: _____

Detainee's Signature: Dallas McIntosh Date: 1/24/15

Shift Supervisor's Signature: [Signature] Date: 1/25/2015

(2)
(cont.)

St. Clair County Jail

DETAINEE GRIEVANCE FORM

#1) Jail Conditions - Since my arrival at the St. Clair County Jail in early October of 2012, I, as well as all other detainees have been subjected to adverse and indecent jail conditions. These conditions include, but are not limited to,

(a) Food - The food in this jail has been constantly prepared in unsanitary conditions. I have regularly been served trays which contain leftover food from previous meals, strands of foreign hair, and on several occasions, insects such as fruit-flies, ants, and roaches.

(b) Exercise - For over a year after my arrival there was virtually no exercise whatsoever provided to me or other detainees. For months on end we were confined to the housing units of the jail. For the greater portion of that year, I was confined to the infirmary of the jail where I was struggling to regain proper use of my legs after gunshot injuries that left me unable to walk without the use and support of a walker. Even against therapy orders by the doctor, I was confined to that small housing area without room or opportunity to walk for over 8 months. The sym

(7)
(Cont.)St. Clair County JailDETAINEE GRIEVANCE FORM

itself was not in any use at all due to detainees being housed there. Other housing units, as well, went months without exercise. Since the 2014 removal of detainees from the gym, housing units are only afforded 1 hour of exercise per week and this is in absence of any exercise equipment besides a basketball. In "max" or segregated housing units, no exercise is provided to detainees at all. In some cases, detainees have been held in "max" for years at a time without ever being given a single minute of exercise.

(c) Air Temperature - Since October 2014, I have been subjected to extremely cold temperatures in B-block. Much of that time, it was well under 45° in temperature. I constantly complained and wrote 'Captains-request-complaint' forms on the issue and I was consistently ignored and given no answer by multiple correctional officers and supervisors - administrators. This condition exists in other housing blocks of the jail as well.

(d) Sanitation / Hygiene - For over 3 months of being housed in B-block, I was forced to reside in a cell / block where the urine and feces of other

(2)
(cont.)St. Clair County JailDETAINEE GRIEVANCE FORM

detainees constantly 'washed' up into the toilets of B-block, coming from the toilets of A-block, and vice-versa. Complaints were made to the staff and 'maintenance'. Upon inspection, maintenance saw the problem and said that it was due to the way the toilets of both blocks were installed and they told us that it would be "too much work" to fix the problem.

For approximately a year, while in the AB-housing unit, I was subjected to the most disgusting and indecent shower areas. There is all kinds of mold and filth on the concrete wall, ceiling, and floors of the shower areas. Even after numerous, unanswered 'Captains - request - complaints' were filed, at no point was an effort made to have these showers adequately cleaned or made sanitary. Touching against this filth, constantly left myself and other detainees with ~~ex~~ rashes on our skin and fungal infections beneath our toe-nails. Also, cleaning supplies are not supplied adequately or frequently enough throughout the weeks to maintain sanitary conditions in any of the jail's showers or 'dayroom' toilets throughout this entire facility.

KEEN SUBPOENA-000004

(5)
(cont.)St. Clair County JailDETAINEE GRIEVANCE FORM

We are not being given enough basic supplies, such as toilet-paper and soap, on a weekly basis. At first we were given a roll of toilet every week and a thick-bar of soap every 2 weeks. Now we are expected to perform the same bodily functions and maintain the same cleanliness of our bodies with one roll of toilet paper every 2 weeks and a bar of soap that is less than half the size of the ones we used to get. We also are not distributed toothbrushes or toothpaste on any regular basis at all. All of this has led to unhygienic conditions for detainees in which we have constantly and insistently complained to practically every C.O. and available supervisors about the lack of these materials. In some cases, even I, as well as others, are forced to resort to using socks to wipe ourselves, forced to wash our bodies and faces less than necessary, and use towels to wipe our teeth because the quality of the toothbrushes are so worn-down. The jail has posted signs stating that there is a shortage on toilet paper, however, shortages last for supply-shipping intervals, not for months on end or permanently. The jail has a responsibility to adequately supply these articles because no person chooses to be

⑥
(cont.)

St. Clair County Jail

DETAINEE GRIEVANCE FORM

here.

(e) Overcrowding - Overcrowding in this jail has led to too many people being housed in unsafe and unsanitary conditions. There has been up to approximately 50 people housed in the 'gym' of the jail up until most recently. These '50' detainees were forced to sleep on the floor amidst spiders and insects. There was not adequate oversight or surveillance in the area and numerous detainees were hurt and injured in fights that took place in 'blind-spots' that constantly escaped the notice of correctional officers. Also, these detainees were forced to share 1 toilet and they had no ready-access to a shower area.

(f) Maximum-Security Housing - The E and F maximum security housing units of this jail are being misused to the detriment of detainees in this jail. Detainees with well-documented mental illnesses are being kept in maximum security cells for 23 hours and sometimes 24 hrs a day when it is obvious from their actions that this segregation is making their mental conditions worse. They are in a sense being punished for having such an

(cont.)

St. Clair County JailDETAINEE GRIEVANCE FORM

overwhelming illness by being housed in 'max' for months at a time. Others who are serving terms in 'max' for disciplinary violations are being kept there much longer than their disciplinary sentence requires. In some cases, they are being housed there for years at a time. During this time they are given absolutely no exercise, no religious services or pastoral interviews, no access to even warm water in their cells, and they are not being apprised by the housing officer or committee of any evaluations or ~~potential~~ potential pending changes in the status of their confinement in 'max'. They are simply told they "are not getting out". I have been housed in maximum security under all of these conditions.

(Responsibility / Relief) - I think that the whole St. Clair County Jail correctional and supervisory staff are to blame for the above-listed conditions. I believe their responsibility stems from them witnessing these obvious deplorable conditions, on a daily basis and their failure to report them to their superiors even after detainees reported them to the officers and submitted complaint forms. I also ~~believe~~ ^{KEEN SUBPOENA-000007} believe the administration (Asst. Jail

(cont.)

St. Clair County JailDETAINEE GRIEVANCE FORM

Superintendent — Thomas Trice, Superintendent — Major Phillip McLaurin, Sheriff — Richard Watson) are responsible because they have an obvious duty to oversee the jail and implement change and action that ensures such deplorable conditions do not arise in the jail.

I strongly believe that due to the overall effect of the totality of these conditions on me and my state of being after living under such said conditions for years, that I in particular, as well as all other detainees who have lived here for a significant amount of time are entitled to relief. First, I believe all of the above listed conditions should be eliminated and then fixed within a reasonable amount of time. Second, I believe that I should be given monetary relief (monetary compensation — money damages) for all infringements, compromises to, and/or violations of any and all Constitutional and/or Human Rights that I and other detainees possess.



From the desk of.....

**Sergeant Matthew Scott
Assistant Shift Supervisor
St. Clair County Sheriff's Department
Ext: 5772**

Date: January 25th, 2015

To: Detainee Dallas McIntosh

Reference: Response to Detainee Grievance Form

On Saturday, January 24th, 2015 at approximately 1550 hours, I received a completed grievance form from you which I gave you on Friday, January 23rd, 2015. Below I will answer for some of the complaints but some of them I am unable to answer due to not having knowledge of them. Since you wrote the grievance form in number/letter form, I will answer them the same.

1(a)-The St. Clair County Jail kitchen, which is operated by certified Aramark food service employees, is inspected on a regular basis for any discrepancies in their operations. If and when there are any issues, they are corrected immediately and the food grade denotes this. Precautionary measures are taken to prevent, as you call "foreign hair" found on the trays. Kitchen trustees are made to wear hair nets which cover their head and nets specially made to cover their beards and mustaches as well as gloves when serving food. Complaints about fruit flies, ants and roaches are taken care of by the St. Clair County Maintenance Office. On a regular basis, preventative measures are taken in an attempt to alleviate any chance of pest problems.

1(b)-While you were in the Infirmary, there is no recreation to the Gymnasium. That is done since anybody that is housed in the Infirmary is housed there for some type of health issue and going up and down the steps could further any liabilities. Detainees housed in the Infirmary are able to perform exercises as instructed by the medical doctor from the comfort of their bunks or walk in place, if needed.

-As stated on page 52, Section 701.260 paragraph C of the Illinois County Jail Standards- "Detainees shall be allowed in the exercise area *for no less than one hour per day* unless the jail administrator determines that participation in such activity by a particular detainee or group is harmful or dangerous to the security or morale of the facility." It further states that, in paragraph A, "sufficient area to allow strenuous physical exercise. A day room may be designated as an exercise room provided the minimum standards for exercise areas are met". In no section of the Illinois County Jail Standards does it state that anybody has to go to the Gymnasium, nor does it state that exercise equipment is to be provided, let alone the basketball that is provided.

-Exercise is permitted to detainees housed in "Max". It is offered in the designated "Rec C" Area which is used only for detainees housed in E and F Blocks (Max). If the detainee has television privileges then they are allowed to watch T.V., if they do not have this privilege, then they are allowed to go to this room for no less than 1 hour if requested. This is all clearly documented as to whether or not the detainee requests any recreation time.

1(c)(d)(e)- Issues with toilets, climate and water temperature are also handled by the maintenance staff which are handled on an almost daily basis. Due to climate changes outside, climate control is adjusted to the temperature based on the season. You make the statement that in B Block "it was well under 45 degrees in temperature". At no time was a thermometer provided to make an accurate temperature statement.

- Cleaning supplies are supplied once per week to the entire jail, Tuesday, to clean individual cells and cell blocks. In this cleaning bucket is provided an abrasive cleanser, bleach, scrub brush, toilet brush and rubber gloves. These supplies are more than adequate to clean a cell and its contents.

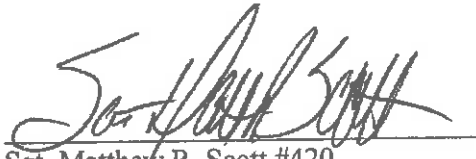
-When mold is discovered in any cell blocks, immediate action is taken to resolve the problem by use of chemicals, scrub brushes and at times, a power sprayer.

-Supplies of toilet paper are given on a regular basis. As for toothbrushes, toothpaste and soap, these items are for sale on the commissary for purchase if there is dissatisfaction in the quality of the provided items.

-When needed due to jail overcrowding, detainees are housed in the Gymnasium. They do not sleep directly on the floor. A plastic "boat" is provided to keep them off of the floor. They are given the same respect as if they were housed in a regular block, i.e. television, phone, visits, showers and toilets. After checking your housing history it does not indicate you ever being housed in the Gymnasium so I am not sure how this pertains to any of your grievance.

1(f)-As previously explained above, detainees housed in Max are given the opportunity to shower and also given the opportunity to utilize the "Rec-C" area. When it comes to the mental conditions of the detainees housed in these areas, a meeting is held, by Illinois County Standards Section 701.70 Subsection (c)-"Review of the detainee's security and assignment classification shall be conducted periodically, but at least every 60 days". These meetings are conducted on a regular basis by the parties that are required to be in attendance.

-Any complaints about incidents involving staff have to be handled by the St. Clair County Jail Administration. Any requests for monetary compensation are to be handled in a court of law, not via a grievance procedure.



Sgt. Matthew R. Scott #420

COPIES GIVEN TO DETAINEE MCINTOSH
ON 1/25/2015 AND THE ORIGINALS WERE INCLUDED
WITH ~~THE~~^{THE} SHIFT PAPERWORK. ^{MS}



ST. CLAIR COUNTY SHERIFF'S DEPARTMENT REQUEST-COMPLAINT FORM



Name Dallas McIntosh Number 453206 Block E-Main Date 1/26/15

Request/ Complaint: My complaint is about the local community sentencing and the St. Clair County Jail. The prices of the items on the commissary list and the value size of the products combine to create a situation of financial exploitation on behalf of kate and the SCJS toward the detainees of this jail, myself included. Also, the list has been altered to create a weekly recurring dependence of the detainees on the commissary, in order for kate and the SCJS to maximize their profit. For example, we are being charged \$1.10 for an

Signature Dallas McIntosh Date 1/26/15

Officers actions: FORWARD TO SHERIFF SUPERVISOR.

Signature [Signature] #458 Date 1-28-15

Supervisors Actions: Forwarded to Supt

Signature [Signature] Date 1-28-15

Admin Action: _____

Pg 2

ST. CLAIR COUNTY SHERIFF'S DEPARTMENT REQUEST-COMPLAINT FORM (cont)

Name: Dallas McIntosh Number: 453206 Block E-Max Date: 1/26/15

Request/Complaint(cont): off-brand 1.5oz ~~bag~~ bag of tortilla chips. A bag of name-brand tortilla chips of the approx. same size cost only 35-40¢ retail price. Even worse, Ramen noodles and like pastas have been removed, without a good reason, from the commissary list. To the best of my knowledge, a package of Ramen noodles, the last time they were sold on commissary at the SCCJ, cost about 70¢ to a \$1.00, while a 'cup' of Ramen noodles may have sold for even higher. At retail price, in the 'free-world', these prices are approximately 20¢ per package and 60¢ per cup, respectively. Not only does this situation occur with the noodles, but it extends to several other items including peanut butter, which used to be sold in approx. 16oz jars for about \$2.15 and is now being sold for 60¢ per 1.2oz tube. I believe the sizes and prices have been purposely manipulated by Keefe and the SCCJ to create an exploitive situation. Even at 5 times the price of \$1.00 per Ramen noodle package ~~or~~ is a detainee could spend the \$50-75 limit on noodles and be able to feed him/herself for a month or better. However, by the situation being exploited as described above, between prices and item selection/sizes, detainees must constantly spend at least ~~50¢~~ ^{\$1.00} on commissary on a weekly basis

KEEN SUBPOENA-000013

Pg 3

ST. CLAIR COUNTY SHERIFF'S DEPARTMENT REQUEST-COMPLAINT FORM (cont.)

Name: Dallas McIntosh Number: 453206 Block: E-Max Date: 1/26/15

Request/Complaint (cont): in order to have just enough food and hygiene to meet their average needs, considering 'food-wise' that it is 15 hours between the last meal of the evening and the first meal at the next morning. Last, but not least, I am complaining about the 'new' taxes that have been attached to items on the commissary list. I feel they are unfair, especially in light of the fact that they did not exist before the middle of 2014 and I question the source, legality, and purpose of these taxes.

It is my belief that the Keefe commissary company and the St. Clair County Sheriff's Department — St. Clair County Jail's administration/administrators ~~are~~ and very possibly the county of St. Clair, IL itself are wholly responsible and to blame for all of the conditions that are described above in this complaint. That includes the Sheriff Richard Watson and all assistant superintendents / superintendents of the jail, individually and collectively as well as in their official capacities. I would like to receive monetary relief for my suffering under these conditions and I also ask that these practices / conditions / policies be reversed and/or ceased.

KEEN SUBPOENA-000014

B 4

ST. CLAIR COUNTY SHERIFF'S DEPARTMENT
REQUEST-COMPLAINT FORM (cont.)

Name: Dallas McIntosh Number: 453206 Block: E-Max Date: 1/26/15

Request/Complaint (cont.): I ask that all responses and/or actions taken on this matter be replied to in writing for my record and recollection.

Signature: Dallas McIntosh Date: 1/26/15



Notary Public 1-26-15



ST. CLAIR COUNTY SHERIFF'S DEPARTMENT REQUEST- COMPLAINT FORM



Name Dallas McInerney Number 453206 Block E-Max Date 1/27/15

Request/ Complaint: I am complaining about the lack of responses, total and meaningful to complaints and requests filed in Citizens' Request Forms and the total inaccessibility of 'Delinquent Grievance Forms' for well over a year, particularly since November of 2013. I have been harassed and obstructed from obtaining responses to particular 'Citizens' Request Complaints' and from getting a 'Grievance Form' as a result of those lack of responses. As a detainee of this jail, I have an absolute right to my complaints being properly processed in the 'ladder' (next pg)

Signature Dallon McInerney Date 1/27/15

Officers actions: FORWARDED TO SHIFT SUPERVISOR.

Signature [Signature] #4054 Date 1-28-15

Supervisors Actions: forward to S.D.

Signature [Signature] Date 1-28-15

Admin Action: _____

Pg. 2

ST. CLAIR COUNTY SHERIFF'S DEPARTMENT REQUEST-COMPLAINT FORM

Name: Dallas McIntosh Number: 453206 Block: E-Max Date: 11/27/18

Request / Complaint (cont): of the St. Clair County Jail grievance system. Prior to my November-2013 complaints being issued, Grievance Forms were more readily available to the detainees of this jail. If we were unsatisfied with a complaint response or action taken or were not provided with a response at all, we were allowed to take the next step of filing a Grievance Form. Now, I and other detainees are being told that the Grievance Form is no longer readily accessible after being removed from the office across from the kitchen. More specifically, we are being told, as sworn to in several legally-notarized ~~the~~ Declarations of Civil Law, that the Supervisors / Officers of this jail have been told and instructed by Asst. Superintendent Thomas Trice and Superintendent Major Phillip L. McLaurin not to give us Grievance Forms. I believe that this is a direct effort on the administration of this jail's behalf to impede / halt action required by the Prison Litigation Reform Act (PLRA) under 42 U.S.C.A. § 1997e(a). If the facts are as several officers and supervisors have attested to, this is a deliberate obstruction of justice and procedure. It indicates a concerted and conspiratorial effort by the above-named administrators, and very ~~possibly~~ possibly St. Clair County Sheriff Richard Watson, to use

KEEN SUBPOENA-000017

Pg 3

ST. CLAIR COUNTY SHERIFF'S DEPARTMENT REQUEST-COMPLAINT FORM

Name: Dallas McIntosh Number: 453206 Block: E-Max Date: 1/27/15

Request / Complaint (cont.): elusive and underhanded (illegal) methods to stop any litigative action from being pursued ~~or~~ by detainees or from being successful. The SCCC 'Detainee Rules and Regulations' handbook notes in bold-print on page 15 that "Detainee Grievance Forms can be obtained from any supervisor or correctional officer." Upon asking for a Grievance Form from an officer, after submitting a Captain-Request-Complaint Form, we are told that only a supervisor can issue them. After speaking with a supervisor, whether a Sergeant or Lieutenant, we were told they did not have access to them. After more persistent questioning, the supervisors changed the story to say that only the Mayor (McLaurin) or Thomas Trice could issue the forms. Now they have told me and other detainees, in full view of each other, that they have been instructed by the above-named administrators, not to give us Detainee Grievance Forms. I would like clarifications on which is true and on the ambiguity of the Grievance Procedure as it is written in the Detainee Rules and Regulations manual. In addition to this, Captain Request-Complaint Forms are not being responded to properly and ~~sometimes~~ ^{many times} not at all. When they are responded to, it is verbally, which for official and recorded purposes is improper. I believe that this

Pg. 4

ST. CLAIR COUNTY SHERIFF'S DEPARTMENT REQUEST - COMPLAINT FORM

Name: Dallas McIntosh Number: 453206 Block: E-Max Date: 1/27/15

Request/Complaint (cont.): is another attempt to subvert the entire Grievance Procedure by avoiding the creation of a written/official transcript-record/document, giving the supervisors/officers/administrators involved in such subversion of the procedure the liberty and license to dispose and/or destroy such complaint forms and thereby allowing them the alibi that such a complaint never took place.

I believe that all the officers, especially and in particular -ly the supervisors (Sergeants/Lieutenants) as well all of the above-named administrators are responsible for all of the circumstances and conditions described above in this complaint. I would like to receive relet monetarily and I ask that the Grievance Procedure be rectified, made clear, and that all attempts to undermine/subvert such proper procedure be ceased immediately. Lastly, I ask that all responses and/or actions taken or made in this matter be replied or submitted to me in writing for the record and my recollection.



Signature: Dallas McIntosh Date: 1/26/15
KEEN SUBPOENA-000019-
McIntosh 1-26-15



ST. CLAIR COUNTY SHERIFF'S DEPARTMENT REQUEST- COMPLAINT FORM



Name Dallas McIntosh Number 453206 Block E-Mc Date 1/28/15

Request/ Complaint: My complaint is about the Securus phone prices. They are
much too high and I feel that the Securus company and the St. Clair
County Jail are engaged in a cooperative effort to extract a vast amount
from detainees of this jail. I feel that both, Securus and the SCCJ
are responsible for taking advantage of the fact that both detainees
of the jail are being held against their will and have no choice in the
matter of phone prices or of using another company besides Securus. I
feel that I am entitled to relief in monetary terms and that the problem
should be corrected.

Signature Dallas McIntosh Date 1/28/15

Officers actions: Forwarded to supervisor

Signature [Signature] Date 01/27/15

Supervisors Actions: Forward to Supt.

Signature [Signature] Date 1-30-15

Admin Action: _____



ST. CLAIR COUNTY SHERIFF'S DEPARTMENT REQUEST- COMPLAINT FORM



Name Dallas McIntosh Number 453200 Block E-Max Date 1/28/15

Request/ Complaint: My complaint is about the punishment that I as well as others have been given as a result of the alleged violations - tickets of 1/16/15 - 1/28/15. We have been prohibited from entering food from the commissary - hot tray services, watching television in the recreation area of the hall, having visits, and using the phone (commissary). I want to know why these actions have been taken against us and what legitimate purpose do these regulations serve in maintaining jail security. Also what administrative purpose such punishment serve

Signature Dallas McIntosh Date 1/28/15

Officers actions: FORWARD TO SHERIFF SUPERVISOR.

Signature [Signature] Date 1-28-15

Supervisors Actions: Forward to Supt. McIntosh

Signature [Signature] Date 1-28-15

Admin Action: _____



ST. CLAIR COUNTY SHERIFF'S DEPARTMENT REQUEST- COMPLAINT FORM



Name Dallas McInerch Number 453206 Block Bakers Date 1/29/15

Request/ Complaint: My complaint is about retaliation on Major McLean's and Captain Trice's behalf against Ronnie Galle Jr and I because we have filed complaints about jail conditions. Upon returning from court, my belongings were thrown in the holding area and I was searched, even though I was searched before going to court. Galle's legal work has been confiscated by Captain Trice and he is being forced to live in a strip cell without his commissary or without a change of underclothes. I ask for this to stop and seek relief.

Signature Dallas McInerch Date 1/29/15

Officers actions: Advised Sgt. Cook of complaints. Sgt. Cook spoke with Detainee McInerch. Complaint forwarded to Supervisor.

Signature Michael B. Smith Date 01/29/15

Supervisors Actions:

Forward to Sgt

Signature

Date

1-30-15

Admin Action:

ST. CLAIR COUNTY SHERIFF'S DEPARTMENT SUBPOENA-000022

Date